

LET EXPERIENCED PILOTS	)	
FLY, INC.,	)	
	)	
Plaintiff,	)	Case No. 1:24-cv-00736
	)	
v.	)	Honorable Franklin U. Valderrama
	)	
AIR LINE PILOTS ASSOCIATION,	)	
INTERNATIONAL,	)	
	)	
Defendant.	)	
	)	

I, Marcus C. Migliore declare as follows:

2. Except as otherwise noted, I have personal knowledge of all matters discussed in this Declaration and am familiar with the documents in the appendix (“Appendix” or “App.”) submitted in connection with ALPA’s motion to dismiss.

3. A true and correct copy of the ALPA Board of Directors Agenda Item 13 from the 48th Regular Board of Directors Meeting held October 19-21, 2020, wherein the Board of Directors adopted a resolution endorsing an initiative to oppose any increase to the statutory retirement age is at Appendix pages App. 1 through App. 3.

4. Paragraph 52 of the First Amended Complaint refers to the ALPA Executive Board's "adopted resolution opposing any attempts to increase the retirement age for professional airline pilots" on May 19, 2022. A true and correct copy of the ALPA Executive Board Meeting Actions from May 18-20, 2022, regarding Agenda Item 9, wherein the Executive Board incorporated the Age 65 Policy into the ALPA Administrative Manual, is at Appendix pages App. 4 through App. 5.

5. A true and correct copy of the ALPA Board of Directors Agenda Item 13 from the 49th Regular Board of Directors Meeting held October 17-20, 2022, wherein the Board of Directors reaffirmed ALPA's Age 65 Policy is at Appendix at pages App. 6 through App. 8.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



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Marcus C. Migliore

3/20/24  
Date